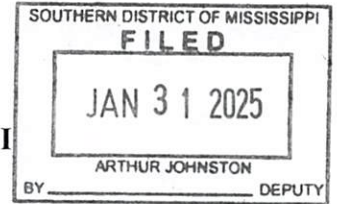


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



SHANICE BOWENS,

Plaintiff,

V.

LETIZIA GOMEZ;
AND JOHN DOES 1-10

Defendants

CASE NO.: 3:25-cv-81-HTW-LGI

INITIAL COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

NOW INTO COURT, SHANICE BOWENS, and files this action against Letizia Gomez and John Does 1-10, and in support of this immediate action would show unto this Court the following, to-wit:

PRELIMINARY STATEMENT

Plaintiff Shanice Bowens, who owns and operates an internet technology company that provides code, design and other valuable and marketable digital information commonly known as “gaming content”, and who uses an unincorporated trade name of “SADITY GIRLS”, brings this matter before the Court pursuant to the Digital Millennium Copyright Act 17 U.S.C. §501 et.seq and more specifically for remedy pursuant to 17 U.S.C. §§512 and 1201.

PARTIES AND JURISDICTION

Plaintiff Shanice Bowens is an adult resident citizen of Jackson, Mississippi and is thereby subject to the jurisdiction of this Court.

Defendant Letizia Gomez claims to be a resident of Los Angeles, California.

The identities and locations of Defendants John Doe 1 through 10 have not been determined.

This action concerns the digital platform commonly known as ROBLOX, which is an online platform headquartered in San Mateo California.

There exists complete diversity of citizenship of the parties and the interested party ROBLOX, thus establishing this Court as a proper forum for this action.

FACTS

Plaintiff has made several digital entries on the Roblox platform under her business profile of SADITY GIRLS. These said entries are protected and regulated by the terms and conditions of the aforementioned 17 U.S.C. §501 et.seq titled Digital Millennium Copyright Act (Herein DMCA). Plaintiff's content has been replicated by the Defendant Letizia Gomez and re-submitted onto the Roblox platform for sale to her exclusive benefit and to the detriment of the Plaintiff. Roblox may refer to this digital material by a "ticket number" 138457433405442.

PLAINTIFF'S COMPLAINT AND REQUEST FOR RELIEF

Plaintiff verily believes that her material and digital product are of the type to be protected under the purview of the DMCA.

Plaintiff verily believes that the Defendants have wilfully and intentionally replicated her product for financial gain and to her financial detriment.

Plaintiff has followed the provisions and systems of the DMCA §1201 (**Safe Harbors and the Notice-and-Takedown System**) without satisfaction.

Plaintiff requests that this Court issue a specific injunction against the Defendants such that this instance of digital piracy will cease and further that future attempts at this behavior be thwarted prior to the inception of same.

DAMAGES

Plaintiff specifically reserves the right to Amend this Complaint after sufficient discovery has been accomplished, as she is unable to set forth a specific amount of actual monetary damages.

Plaintiff would show that the acts of the Defendants are wilful and intentional and as such

give rise to punitive damages. Such damages should be set at \$50,000.00 per instance, or other such amount as this Court deems appropriate.

RELIEF REQUESTED

Plaintiff requests an injunction against the Defendant Letizia Gomez preventing her from the repeated process of replicating the digital work product of the Plaintiff; and,

Plaintiff request an award of actual damages against the Defendants in an amount to be determined; and,

Plaintiff requests an award of punitive damages against the Defendants; and,


____Plaintiff requests all attorney's fees to be taxed to the Defendants. Plaintiff does not anticipate attorney's fees, expert witness fees, deposition fees or other ancillary or related fees and costs of court to eclipse \$30,000.00 and therefore, requests an award of that amount.

Plaintiff requests any and all other relief, general or specific, that this Court deems appropriate and proper in these circumstances.

Respectfully submitted this the 31st day of January, 2025.



Shanice Bowens



/s/ Michael M. Louvier

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